



Renewable Energy & Human Rights Benchmark 2025 Company Profile

Company name	Trina Solar
Sub-sector	Solar PV Manufacturer & developer
Overall score	11% weighted average

Section score	Weighting	For section
21%	20%	1. UNGP core indicators
8%	40%	2. Salient human rights risks
0%	10%	3.a Response to exposure of risk to forced labour
N/A	10%	3.b Serious allegations
N/A	20%	4. Low Carbon Transition assessment

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found [here](#).

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

Detailed assessment

1. UNGP core indicators based on the CHRB methodology (20% of total)

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none">Met: General HRs commitment: The Company states that 'We pledge to uphold internationally recognized human rights principles throughout our operations and value chain, including Universal Declaration of Human Rights, United Nations Global Compact (UNGC), UN Guiding Principles on Business and Human Rights, International Bill of Human Rights, International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the laws of the countries in which we operate.' [Global Human Rights Principles, 10/08/2024: static.trinasolar.com]Met: Commitment to UNGPs: see above. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com]
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none">Met: Commitment to ILO core principles: The Company states in its Global Human Rights Principles that 'We pledge to uphold internationally recognized human rights principles throughout our operations and value chain, including [...], International Labor Organization's Declaration on Fundamental Principles and Rights at Work' [Global Human Rights Principles, 10/08/2024: static.trinasolar.com]Not Met: Expects business relationships to commit to ILO core principles: The Company indicates in its Global Human Rights Principles 'We encourage our partners and other relevant parties to adhere to the principles embodied in this policy and to develop and implement similar policies.' However, no clear

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			expectation of business relationships to comply with the ILO core principles was found. The company provided feedback to this indicator but information was not material. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com]
A.3	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts: In its Global Human Rights Principles, the Company states that 'We have established mechanisms to address and remediate instances of child labor.' However, no further information is found as to whether the company also has a remediation system for other adverse human right impact on individuals, workers, and communities. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com] • Not Met: Expects business relationships to make this commitment • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with business relationships on remedy
A.4	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Company has commented that in its latest 2024 Sustainability Report, which is not published yet, the Company states 'The Board of Directors, as the highest responsible body for ESG matters, oversees and guides the management of ESG and sustainability issues; the Strategic Executive Committee serves as the governance bodies for ESG management and the highest decision-making bodies for ESG matters, accountable to the Board, bearing core responsibility for ESG decisions and reporting, responsible for reviewing and deciding on ESG strategies and long-term ESG plans, with the Strategic Executive Committee led by the Chairman overseeing ESG strategy.' The Company ESG includes H&S and labour issues. [2024 Trinasolar Sustainability Report: static.trinasolar.com] • Not Met: Describes HRs expertise of Board member • Not Met: Board member/CEO signal importance of HRs in their communications • Not Met: CEO or board incentives
A.5	Responsible lobbying and political engagement fundamentals	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: Company provided feedback for this indicator but information was not material. No further information found in the public domain. • Not Met: Monetary value of direct political contributions: Company provided feedback for this indicator but information was not material. No further information found in the public domain. • Not Met: Monetary value of indirect political contributions • Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies): The Company states in its Anti-bribery Compliance Management Policy that 'strictly prohibits the political donations of any kind to candidates or governmental officials running for political office [...] and it also prohibits from making any cash or non-cash payments of facilitation or 'acceleration fees', and from making any facilitation or 'acceleration fee' payments through a Business Partner.' However, no information found on the requirements for third-party lobbyists to comply with the Company's lobbying and political engagement policies. [Anti-bribery Compliance Management Policy, 15/11/2024: static.trinasolar.com]

B. Embedding respect and human rights due diligence

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B.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Senior responsibility for HRs implementation and decision making: The Company indicates in its 2023 Sustainability Report 'The Company continues to enhance compliance and risk management and has incorporated Environmental, Social and Governance (ESG) factors into decision-making and daily operations. By doing so, we continuously improve our corporate governance and supervision as well as the resilience of our operations and management, thus facilitating our sustained and sound development and enhancing our competitiveness. [...] ESG Management Committee, the management body of the Company's sustainable development, which consists of the leaders of key ESG departments and business divisions, is responsible for formulating and approving relevant policies and targets to ensure that ESG strategies are put into practice.' It further states that the role of the ESG Management Committee as 'Formulate ESG strategic planning and annual work plan; coordinate, guide, supervise and make decisions on major ESG matters and issues, and supervise the operation of ESG management system.' [2023 Sustainability Report, 2024: static.trinasolar.com]

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			<ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments: The Company states that 'ESG relative departments serve as execution to incorporate the ESG concepts in daily business activities. In addition, we have set up an independent supervisory department and built an internal three-line defence mechanism to ensure the compliance and effectiveness of ESG management through internal audits and external third-party independent verification, so as to strongly guarantee that the Company fulfils the ESG commitments' It further states that each ESG undertaking department 'Effectively implement ESG management processes; formulate implementation paths and annual plans based on ESG medium and long-term planning; implement ESG management pathways, and ensure the achievement and continuous improvement of phase-by-phase targets and ESG performance.' However, it is not clear how responsibility for the day-to-day implementation for Human Rights commitments in particular is set up within this Company. The company provided feedback but information was not material. [2023 Sustainability Report, 2024: static.trinasolar.com] • Not Met: Day-to-day resources and expertise allocation in own operations: The Company 2024 Sustainability Report states 'The Board of Directors, as the highest responsible body for ESG matters, oversees and guides the management of ESG and sustainability issues; the Strategic Executive Committee serves as the governance bodies for ESG management and the highest decision-making bodies for ESG matters, accountable to the Board, bearing core responsibility for ESG decisions and reporting, responsible for reviewing and deciding on ESG strategies and long-term ESG plans, with the Strategic Executive Committee led by the Chairman overseeing ESG strategy.' However, no further information found on how the day-to-day resources or expertise is allocated. • Not Met: Resources and expertise allocation in supply chain
B.2	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations: The 2023 Sustainability Report states 'In 2023, Trinasolar incorporated the economic, environmental and human rights sustainability impacts of issues into stakeholder research and materiality assessment, as required by the GRI Standards 2021. Based on Trinasolar's vision, values and the characteristics of the industry in which we operate, the Company benchmarked domestic and international industry policies and standards, and ranked the importance of material issues by combining stakeholder communications, discussions among the Company's management and expert advice. The Company conducts stakeholder questionnaire surveys and in-depth communications once every two years. During the Reporting Period, Trinasolar continuously tracked changes in the attention of key stakeholders to ESG issues and optimized the materiality pool in terms of the importance to Trinasolar's development and the importance to stakeholders, respectively. We conducted a large-scale stakeholder survey to collect responses from internal stakeholders (management and general employees) and external stakeholders (customers, investors, suppliers and partners, society and NGOs, and media). The Company consolidated the results of the stakeholder survey, as well as Trinasolar's management's insights from the industry's sustainability status and key issues identified, thus developing 2023 Materiality Matrix.' However, no evidence found of the process it has in place to identify its human rights risks and impacts covering its own operations. Current evidence refers to a materiality analysis which does not necessarily entail a human rights due diligence identification process. [2023 Sustainability Report, 2024: static.trinasolar.com] • Not Met: Describes process for identifying risks in business relationships: The Company states in its Supply Chain Due Diligence Manual that 'The company will conduct detailed due diligence management of the supply chain to identify the actual or potential impacts that the upstream supply chain may have on the economy, environment and society. Based on these identifications, specific due diligence management plans and implementation plans are formulated to reduce the identified risks in the operation and activity chain. Trina Solar establishes, implements, maintains and continuously improves a process-based due diligence system in accordance with the requirements of the aforementioned Act, standards and guidelines. Trina Solar identifies processes relevant to achieving due diligence management objectives and their application within the company, including those processes that involve due diligence management and those processes that do not involve due diligence management but affect the achievement or delivery of responsible business conduct. During the due diligence system planning process, specific consideration is given to the response to identified due diligence management risks and opportunities and to changes required for the process to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>achieve its intended results.' However, it is not clear how the company is identifying its HR risks. [2023 Sustainability Report, 2024: static.trinasolar.com]</p> <ul style="list-style-type: none"> • Not Met: Describes risk identification system incl. stakeholder consultation: The 2023 Sustainability Report states 'During the Reporting Period, Trinasolar continuously tracked changes in the attention of key stakeholders to ESG issues and optimized the materiality pool in terms of the importance to Trinasolar's development and the importance to stakeholders, respectively. We conducted a large-scale stakeholder survey to collect responses from internal stakeholders (management and general employees) and external stakeholders (customers, investors, suppliers and partners, society and NGOs, and media). The Company consolidated the results of the stakeholder survey, as well as Trinasolar's management's insights from the industry's sustainability status and key issues identified, thus developing 2023 Materiality Matrix.' However, the current evidence refers to a materiality analysis which does not necessarily entail a human rights due diligence identification process. [2024 Trinasolar Sustainability Report: static.trinasolar.com] • Not Met: Describes how risk identification system is triggered by new circumstances
B.3	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The Company states in its Supply Chain Due Diligence Manual that 'will conduct detailed due diligence management of the supply chain to identify the actual or potential impacts that the upstream supply chain may have on the economy, environment and society. Based on these identifications, specific due diligence management plans and implementation plans are formulated to reduce the identified risks in the operation and activity chain. Trina Solar establishes, implements, maintains and continuously improves a process-based due diligence system in accordance with the requirements of the aforementioned Act, standards and guidelines. Trina Solar identifies processes relevant to achieving due diligence management objectives and their application within the company, including those processes that involve due diligence management and those processes that do not involve due diligence management but affect the achievement or delivery of responsible business conduct. During the due diligence system planning process, specific consideration is given to the response to identified due diligence management risks and opportunities and to changes required for the process to achieve its intended results.' However, this description should include how relevant factors are taken into account, such as geographical, economic, social and other factors. Current evidence includes a materiality analysis which does not necessarily entail a human rights due diligence assessment process. [Trina Solar Supply Chain Due Diligence Manual, 30/09/2024: static.trinasolar.com] • Not Met: Describes how process applies to supply chain • Not Met: Public disclosure of results of HRs risk assessment • Not Met: Describes how assessment involved affected stakeholders
B.4	Integrating and acting on human rights risks and impact assessments	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to supply chain: The Company indicates ' We have developed the Trinasolar's Supplier Code of Conduct, the Trinasolar Supplier Social Responsibility Commitment, the Procurement Management Guidelines, and the Supplier Classification and Grading Management Specifications to provide guidelines for full lifecycle supplier management. We include ESG-related clauses in our contracts with suppliers. During the Reporting Period, we revised the Trinasolar's Supplier Code of Conduct to emphasize that suppliers should have ISO 14001, ISO 45001 and ISO 50001 certificates or plan to obtain them, or have workable environmental, health and safety system, and energy management systems. In 2023, we further required suppliers to communicate to their supply chains the environmental and human rights requirements set out in Trinasolar's Supplier Code of Conduct as well as the ESG-related clauses specified in the contract' However, it is not clear which ESG issues it includes in supplier contracts. No information was found on a system that is clearly aimed at preventing, mitigating and remediating human rights issues in the company's supply chain. [2023 Sustainability Report, 2024: static.trinasolar.com] • Met: Example of actions decided on at least 1 salient HRs issue: For example, in terms of conflict minerals in DRC, the 2023 Sustainability Report states that "For conflict minerals, Trinasolar has set the objective of resolutely 100% not purchasing or supporting the use of "conflict minerals". In 2015, we issued and implemented a Conflict Minerals Management Framework, which defined a 5-step process to identify potential conflict minerals in the materials we used. Meanwhile, we continue to promote key material suppliers to complete CMRT due

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			diligence, and disclose the management performance concerning conflict minerals in annual sustainability reports. [...] Adoption of a supplier CMRT questionnaire to obtain the necessary information from suppliers to assess the sourcing and procurement of 3TGs in order to meet the conflict minerals reporting requirements. The supplier control matrix risk assessment is carried out based on the supplier's feedback on the country of origin investigation to a reasonable degree. Report on the status of conflict minerals for each subsidiary's product components, as required by the template issued by the head office. Sorting out and ensuring compliance with existing practical operational processes.' [2023 Sustainability Report, 2024: static.trinasolar.com] <ul style="list-style-type: none"> • Not Met: Describes how stakeholders involved in decisions about actions taken
B.5	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.6	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Provides one example of comms with stakeholders: The 2023 Sustainability Report states 'We regularly conduct survey to understand the opinions and suggestions of internal stakeholders such as employees and management, as well as the expectations and responses of external stakeholders such as government and regulatory agencies, shareholders and investors, customers, suppliers and partners, media, community and non-governmental organizations through various communication channels, and regularly summarize and provide feedback to the Company's management, and carry out targeted communication. [...] We hold regular staff and departmental meetings to discuss the Company's operations, product and departmental issues, etc., providing employees with face-to-face communication opportunities with management. We organize employee satisfaction surveys from time to time to understand employees' opinions and suggestions on the Company's operation and development, so as to empower management improvement.' However, no examples found demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. [2022 Sustainability Report, 2023: static.trinasolar.com] <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: Trina Solar's 2022 Sustainability Report indicates that "Trina Solar values the voices of employees and encourages them to solve problems and disputes through internal communication and grievance mechanisms in order to create and maintain a good working atmosphere." Trina Solar Global Human Rights Principles states that "To gather and address concerns from all parties, Trinasolar has established a grievance and reporting mechanism. Employees, suppliers, business partners, customers, and other stakeholders can provide feedback or report incidents related to human rights violations or concerns through various channels, including phone email, and physical mail, either anonymously or with their identity disclosed. We will investigate these reports in accordance with our Reporting Management Policy and provide timely follow-up feedback. Additionally, we will ensure the confidentiality of the whistleblower's information to protect them from retaliation." [2022 Sustainability Report, 2023: static.trinasolar.com] & [Global Human Rights Principles, 10/08/2024: static.trinasolar.com] <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The 2023 Sustainability Report discloses that 'To create a fair and open working atmosphere, we have set up complaints channels that are set out in the Employee Handbook to inform all employees.' The online portal appears to be available on two languages. However, no evidence found of how it ensures the mechanism is available in all appropriate languages. [2023 Sustainability Report, 2024: static.trinasolar.com] & [Compliance Information Reporting Platform_web, N/A: wb.trinasolar.com:8090]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes how workers in supply chain access grievance mechanism: The Global Human Rights Principles indicate that 'suppliers' as well as 'other stakeholders' have access to the grievance channel. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com] • Not Met: Expects business relationships to convey expectation to their business relationships: The Human Rights Principles states: 'Trina Solar is committed to respecting internationally recognized human rights principles in our operations and throughout our value chain, including Universal Declaration of Human Rights, United Nations Global Compact (UNGC), ILO Declaration on Fundamental Principles and Rights at Work, Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the laws of the countries in which we operate'. However, it is not clear the Company expects business partners to convey expectations [to have a channel from which workers can access to raise Complaints or concerns about human rights issues at the Company's business partners] on access to grievance mechanism(s) to their business partners. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com]
C.2	Grievance mechanism(s) for external individuals and communities	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The Global Human Rights Principles states that 'To gather and address concerns from all parties, Trinasolar has established a grievance and reporting mechanism. Employees, suppliers, business partners, customers, and other stakeholders can provide feedback or report incidents related to human rights violations or concerns through various channels, including phone, email, and physical mail, either anonymously or with their identity disclosed. We will investigate these reports in accordance with our Reporting Management Policy and provide timely follow-up feedback. Additionally, we will ensure the confidentiality of the whistleblower's information to protect them from retaliation.' It discloses information on the different channels. The Compliance Information Reporting Platform is available online. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com] • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Compliance Information Reporting Platform is available in in both Chinese and English. The Company's Sustainability Reports are available online and contain information on the grievance mechanisms. However, this subindicator focuses on the description of how the Company actively ensures that all affected external stakeholders at its own operations are aware of these grievance mechanisms. Moreover, it is not clear it is available in local languages. The Company has made reference to the Business Ethics and Code of Conduct for Employees, which could not be publicly found. [2023 Sustainability Report, 2024: static.trinasolar.com] & [Compliance Information Reporting Platform_web, N/A: wb.trinasolar.com:8090] • Not Met: Describes how external individuals/communities access grievance mechanism: See above. However, it is not clear that external individuals and communities have access to it, in order to raise complaints or concerns about human rights issues at the Company's suppliers or other business relationships. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com] & [Compliance Information Reporting Platform_web, N/A: wb.trinasolar.com:8090] • Not Met: Expects business relationships to convey expectation to their business relationships
C.3	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy

2. Salient human rights risks (40% of total)

D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.M	Commitment to respect indigenous peoples' rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectation of project developer clients to have a public commitment to respect indigenous rights: The Company states in its Corporate Social Responsibility Code of Conduct of Trina Solar Supplier that 'This CSR Code of Conduct outlines Trina Solar's expectations and requirements for suppliers in terms of labor protection, occupational health and safety, environmental protection, ethics, and social responsibility management systems. To ensure that suppliers conduct their business with high integrity and in a socially and environmentally responsible manner, all suppliers of Trina Solar shall comply with this CSR Code of

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			<p>Conduct. Trina Solar requires suppliers to comply with all applicable laws and regulations in the country/region where they are located in all their business activities as a prerequisite for cooperation with Trina Solar. A'. However, it is not clear it expects project developer clients to have a public commitment to respect indigenous peoples' rights in line with international law and standards. [Corporate Social Responsibility Code of Conduct of Trina Solar Supplier (Outline): static.trinasolar.com]</p> <ul style="list-style-type: none"> • Not Met: Commitment to only work with business partners that respect FPIC: On its Biodiversity Conservation Policy the company states that 'The Company respects the rights of indigenous peoples and communities to provide their free, prior, and informed consent, and conducts its business activities on lands where it holds legal rights. It is committed to not infringing upon the rights of indigenous peoples to the use of land, forests, and water resources.' However, no evidence is found that the Company is committed to only working with partners that respects free prior and informed consent (FPIC). [Biodiversity Conservation Policy, 2024: static.trinasolar.com]
D.2.M	Engagement with all affected communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes how local communities identified and engaged in the last two years: For manufacturers, this criteria is looking for a process to engage with communities on potential impacts related to the operational phase of the project the manufacturer is involved in (i.e.: impacts of the construction, operation/maintenance on communities for example). The 2023 Sustainability Report indicates . Based on Trinasolar's vision, values and the characteristics of the industry in which we operate, the Company benchmarked domestic and international industry policies and standards, and ranked the importance of material issues by combining stakeholder communications, discussions among the Company's management and expert advice. The Company conducts stakeholder questionnaire surveys and in-depth communications once every two years.' It discloses its different stakeholder groups as well as focus areas and mode engagement for each of these groups. It also reports on its materiality matrix. However, no description found on the process by which it has identified affected stakeholders (read local communities and indigenous groups) with whom to engage, and engaged with them in the last two years. [2023 Sustainability Report, 2024: static.trinasolar.com] • Not Met: Provides two examples of engagement with communities: The 2022 Sustainability Report discloses information on 'Improving Labor Protection in Supply Chain: 'We require our suppliers to comply with international labor standards and the requirements of Trina Solar's Code of Business Conduct, respect the basic human rights of their full- and part-time employees, and fulfil the responsibilities to protect the health and safety of their employees. We explicitly list the key audit requirements for labor human rights protection and occupational health and safety in the Supplier EHS Management Procedures to ensure unbiased supplier labor rights with clear audit and evaluation management procedures'. It also explains its Supply Chain Injury Prevention Capacity Building Project. However, no examples of its engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multistakeholder initiatives) in the last two years found. Engagement in this context is understood as ongoing process of interaction and dialogue between the Company and its affected stakeholders that enables it to hear, understand and respond to their interests and concerns, including through collaborative approaches. The Company is expected to provide two of such examples. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Examples of engagement refer to marginalised groups and provide additional detail: The 2022 Sustainability Report explains the 'Lighting up the "Photovoltaic Campus" project. 'For many years, Muer Primary School in Xichang City, [...] has been faced with a shortage of electricity supply and frequent power outages due to its geographical environment. In 2022, Trina Solar assisted Muer Primary School in building a 13.5 kilowatt photovoltaic power plant with an average annual power generation capacity of 17,900 KWh. The project adopts a "self-generation, surplus power online" model, which brightens up the campus and ensures stable electricity consumption for teaching, while bringing sustainable income to the school and helping the national "carbon peak and carbon neutral" goal and green development of the countryside'. However, this subindicator looks for a description of how affected communities by the Company's operations were identified [in the context of the examples provided above], how consultations took place, if and how traditionally marginalised groups were included (for example, women, indigenous peoples, afro-descendants, religious minorities, people with disabilities, LGBTQA+, children), evidence of if, how, and when free, prior and

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			<p>informed consent for projects was achieved, and what happened when it was not. [2022 Sustainability Report, 2023: static.trinasolar.com]</p> <ul style="list-style-type: none"> • Not Met: The company meets B2.C, B3.D, B4.D and B.5.C
D.3.M	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Rewards for clients that have a commitment to identify potential benefit and ownership sharing: The 2022 Sustainability Report notes: 'We evaluate suppliers in various aspects such as technology, quality, delivery, service, cost, innovation, social responsibility, safety, and environment according to their categories and with different weights. Furthermore, we complete an assessment and recognition of suppliers based on the evaluation results, while carrying out targeted communication and counselling, and gradually restricting procurement, freezing and eliminating suppliers that fail to improve in the long run'. However, no evidence found that the Company rewards relevant businesses (project developer clients) in its value chain for having a commitment to identify potential benefit and ownership sharing options that serve affected communities including a commitment to explore co-ownership models. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Rewards for clients for disclosing statistics for each project (demographics of ownership sharing): The 2022 Sustainability Report notes: 'Trina Solar actively builds a new supply ecosystem focusing on the customers. In January 2022, the Trina Solar Global Supplier Conference was held in Changzhou with the theme of "Building a New Eco-system for the PV Industry with Openness and Innovation". The conference set up four awards: Joint Innovation Award, Best Collaboration Award, Quality Excellence Award, and Excellent Supplier Award to thank our supplier partners for their sincere cooperation as always'. However, no evidence found that it rewards relevant businesses in its value chain (for example project developer clients) for disclosing statistics for each of its projects and/or operations describing the demographics of its benefits and ownership sharing processes, including any final agreements, percentage of revenue of projects and/or equity shares paid to local communities, and how members of affected communities participated in the decision-making. [2022 Sustainability Report, 2023: static.trinasolar.com]
D.4.M	Local wind & solar energy access, affordability	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Actions taken to support access and affordability of renewable energy in the value chain: The 2023 Sustainability Report states 'As a global leader in smart solar energy and storage solutions, Trinasolar gives full play to our strengths in product, resource and platform. Therefore, the Company is able to support the low-carbon transition in various industries and come up with feasible solutions for zero-carbon practices in the industrial and commercial sectors. Trinasolar protects the environment with low-carbon development and empowers the global transition to greener energy.' The Company also discloses information on its Solar's Vertex Modules in the Sunshine Bank: 'In 2022, the residents of Yaoma Village and Zhujia North Village in Zibo, Shandong Province, have installed and used Trina Vertex modules in every household, which have become a "sunshine bank" for local villagers while continuously producing clean energy. Among them, the total annual power generation capacity of the Yaoma Village household project can reach about 2.8 million KWh, generating an income of about 1.1 million RMB for the villagers; the 1 MW village-level PV power generation project in Zhujia North Village is expected to generate a total of 1.5 million degrees per year, and the power generated will be centralized and synced to the national grid. This initiative can make full use of the roofs of rural houses, bring villagers income from housing rental fees and develop the local low-carbon economy'. However, evidence does not seem to cover the Company's value chain. [2023 Sustainability Report, 2024: static.trinasolar.com] & [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Public support for government policies addressing energy access: The 2022 Sustainability Report states: 'Our mission is "Solar Energy for All", and the Company's long-term layout and action plans for sustainable development are moving forward. [...] Trina Solar has adhered to the mission of "Solar Energy for All", and has always been committed to leading the way in smart solar energy solutions for a net-zero future'. The Company indicates it is a supporter of the Global Renewable Alliance. However, no evidence found that it publicly supports government policies and actions to address energy access challenges (including but not limited to affordability of electricity, grid electrification, mini grids, etc). [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Including a timebound action plan and reporting targets on supporting energy access and affordability in consultation with communities: The 2022 Sustainability Report notes: 'Trina Solar actively fulfils its corporate social responsibility, reaches out to the disadvantaged and poor groups through public

Indicator Code	Indicator name	Score (out of 2)	Explanation
			welfare activities, carries out precise support work from multiple angles and directions, actively guides students in less developed regions to learn new energy industry application knowledge and technology, helps local entrepreneurship and employment, and contributes to the economic development of less developed regions'. It adds: 'Since its establishment, Trina Solar has actively undertaken social responsibility, practiced its initial intention and mission, and promoted the global energy transition. We continue to promote the construction of renewable energy, ensure the global supply of products, and provide renewable energy products and technology training to developing countries, contributing to the empowerment of the global energy transition. We deeply care about the uneven development of regions at home and abroad, and provide as much help and support as we can to give back to local communities while progressing alongside society. During the Reporting Period, our total community contribution and philanthropic investment funds amounted for 4.795 million RMB'. However, this indicator expects a timebound actions plan and reporting on targets developed in consultation with communities including marginalised groups at heightened risk of energy poverty. No further evidence found. [2022 Sustainability Report, 2023: static.trinasolar.com]

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.M	Respect for land and natural resource tenure rights	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Expectation for clients to have commitment to respect land ownership/natural resources as in VGGT: The EHS and Energy Management Policy notes 'We pay attention to employees' health & safety and sustainable development. We are dedicated to creating a safe, healthy and environmentally-friendly workplace for employees and a harmonious green planet for mankind. We promise to use energy and natural resources responsibly and efficiently, and participate in global carbon reduction initiatives'. However, no evidence found that it expects business partners (project developer clients) in its value chain to have a public commitment to respecting land rights of legitimate tenure rights holders as set out in the UN VGGT, including where land and ownership rights are customary and/or not formally recorded (including via contractual agreements with suppliers, supplier code of conduct or other relevant practices). [EHS and Energy Management Policy, 09/2023: static.trinasolar.com] • Not Met: Steps taken to use leverage to resolve land rights issues
E.2.M	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Expectations for clients to commit to IFC PS 5 for physical and economic displacements • Not Met: Steps taken to use leverage

F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.M	Operating in or sourcing from conflict-affected areas	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas: Although the Company formulates a formal conflict minerals management policy, no commitment to address the heightened human rights risks associated with operations in or sourcing from conflict-affected and/or high-risk areas found, in line with the recommendations of the UN Working Group on business and human rights. [2023 Sustainability Report, 2024: static.trinasolar.com] & [Global Human Rights Principles, 10/08/2024: static.trinasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens: The Company describes its process of 'Conflict Minerals Management': 'Determine the scope of products and suppliers - Review bill of materials for products to identify 3TG and corresponding suppliers; Perform a reasonable level of mineral origin investigation - Use supplier CMRT questionnaires to obtain the necessary information from suppliers to assess the source and sourcing of 3TG to meet conflict minerals reporting requirements; Conduct due diligence Conduct supplier control matrix risk assessment based on feedback from suppliers on country of origin surveys for reasonable levels of minerals - Each subsidiary submits its findings to the head office; Report the conflict mineral status of each subsidiary's product components as required by the template issued by the head office - Sort out the process - Sort out and ensure compliance with existing operational processes'. However, no details of the steps to mitigate this or other risks related with operating our sourcing from CAHRAs was found. [2023 Sustainability Report, 2024: static.trinasolar.com] • Not Met: How stakeholders are involved in the process to mitigate risks: The Human Rights Principles states: 'We have a good understanding of conflict minerals requirements and work diligently with suppliers to promote sustainable development by way of ethical sourcing. Trina Solar formulates formal conflict minerals management policy and requires all suppliers to sign and apply it into their product chains to avoid any kind of conflict minerals, and deliver the requirement to downstream suppliers'. The 2022 Sustainability Report explains its communication strategy: 'Through various communication channels, we regularly collect the views and suggestions of internal stakeholders such as employees and Management, as well as the expectations and responses of external stakeholders such as government and regulatory bodies, shareholders and investors, customers, suppliers and partners, media, community, and NGOs. The collected data is regularly summarize and feedback is provided to the Company's management. Targeted communications are also conducted'. The Company points out it is a member of the Solar Stewardship Initiative. However, it is not clear how it engages with stakeholders as part of its process to mitigate risks when operating in or sourcing from conflict-affected and/or high-risk areas regions. [2022 Sustainability Report, 2023: static.trinasolar.com]
F.2.M	Evidence of security provider human rights assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Description of implementation of security approach and example • Not Met: Description of monitoring of business partners • Not Met: Local communities engaged in assessment of security • Not Met: Example of working with community on this issue

G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.M	Responsible sourcing of minerals: arrangements with suppliers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Policy statement on OECD Guidance aligned due diligence: The Company states that 'We follow the OECD Due Diligence Guidelines and integrate due diligence requirements into our procurement strategy and business processes, including supplier certification, selection, monitoring and auditing, performance management and exit processes, prioritizing the selection of suppliers with excellent due diligence performance and restricting the use of non-compliant suppliers. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com] & [Trina Solar Supply Chain Due Diligence Manual, 30/09/2024: static.trinasolar.com] • Not Met: The policy explicitly covers all minerals • Not Met: Policy expectations of business relationships • Not Met: Contractual requirement for smelters/refiners to follow OECD
G.2.M	Responsible sourcing of minerals: mapping and disclosing the supply chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and mapping of suppliers: The 2023 Sustainability Report states that 'Trina Solar does not purchase or support the use of "conflict minerals". In 2015, we issued and implemented a Conflict Minerals Management Framework, which defined a 5-step process to identify potential conflict minerals in the materials we used. Meanwhile, we continued to promote key material suppliers to complete CMRT due diligence.' Additionally, it discloses the 'Number of Suppliers Involved in the Risk of Using conflict Minerals' and 'Of which the proportion of suppliers Signed non-Conflict Minerals Statement'. However, no description found of its processes for identifying and prioritising risks and impacts in its mineral supply chain as set out in the OECD Guidance. Furthermore, it is unclear if its supplier mapping involves both direct and indirect suppliers. [2023 Sustainability Report, 2024: static.trinasolar.com] • Not Met: Traceability system for mineral supply chain • Not Met: Discloses smelters/refiners that are most significant part of supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Suppliers in higher risk activities, geographies, products: The Company states that 'For conflict minerals, Trinasolar has set the objective of resolutely 100% not purchasing or supporting the use of "conflict minerals". In 2015, we issued and implemented a Conflict Minerals Management Framework.' The Company reports in its 2023 Conflict Minerals Management Key Performance that 10 suppliers in junction box and 10 suppliers in soldering strip are involved in the risk of using conflict minerals. [2023 Sustainability Report, 2024: static.trinasolar.com]
G.3.M	Responsible sourcing of minerals: risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and prioritising of risks in supply chain: The Company states that 'We follow the OECD Due Diligence Guidelines and integrate due diligence requirements into our procurement strategy and business processes, including supplier certification, selection, monitoring and auditing, performance management and exit processes, prioritizing the selection of suppliers with excellent due diligence performance and restricting the use of non-compliant suppliers.' However, no further information is found on the process for identifying risks and impacts in its supply chains. [Trina Solar Supply Chain Due Diligence Manual, 30/09/2024: static.trinasolar.com] • Not Met: Description of process to identify smelters/refiners and whether they carry out DD • Not Met: Disclosure of qualified smelters/refiners • Not Met: Processes cover minerals assessed as highest risk

H. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.M	Commitment to respect the rights of human rights and environmental defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expectation on business partners in value chain to make this commitment • Not Met: Description of how working with HRDs as part of risk assessment and DD • Not Met: Description of how working with HRDs to create safe and enabling environment

I. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.M	Health and safety	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: Trina Solar's 2023 Sustainability Report states that "The Total Recordable Incident Rate (TRR) in 2023 was 0.841. By the end of 2023, Trinasolar had no work-related fatalities for three consecutive years" [2023 Sustainability Report, 2024: static.trinasolar.com] • Not Met: Expects disclosure of H&S information of relevant business relationships • Not Met: Targets for H&S performance (including injury rates or lost days and fatalities): The 2023 Sustainability Report notes: 'During the Reporting Period, Trinasolar invested a total of 67.63 million RMB in employee occupational health and safety, organized a total of 446 emergency drills at all of our production bases, conducted occupational health training sessions covering 151,984 participants of both Trinasolar employees and outsourced suppliers. Trinasolar's Chinese and overseas plants have institutionalized occupational health and safety management and have all obtained ISO 45001 Occupational Health and Safety management System Certification except the Vietnam Crystal Silicon. We have established a long-term global safety accident management mechanism and optimized the Work Safety Accident Investigation Management System among others. All plants worldwide are required to report safety accidents within a specified time frame, to analyze the causes of incidents, and to take preventive and corrective measures in a timely and targeted manner, thus reducing safety accidents. By the end of 2023, Trinasolar had no work-related fatalities for three consecutive years.' However, no clear targets for health& safety performance was found. • Not Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts
I.2.M	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Capacity building with suppliers: The Company states that 'Suppliers commit to respecting the human rights of employees and ensuring their dignity. This applies to direct and indirect suppliers, as well as all employees including temporary workers, migrant workers, student workers, contract workers, direct employees, and any other type of employee. It ensures compliance with applicable laws and regulations prohibiting forced labor' However, no information was found on activities of capacity building with suppliers on forced labour. [Corporate Social Responsibility Code of Conduct of Trina Solar Supplier (Outline): static.trinasolar.com] • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: According to the 2022 Sustainability Report, 'Trina Solar has defined a "zero tolerance" policy for child labor and forced labor in the Trina Solar Employee Handbook, the Human Resources Recruitment and Employment Management System, and other internal rules and regulations, and actively protects the basic rights and interests of employees through information audits, background checks by internal or third-party organizations, and regulations on working hours and overtime approval processes. We strictly follow the laws and regulations of China and our operating regions and the provisions of the Trina Solar Employee Handbook, and do not use child labor and strictly prohibit forced labor. In addition, we have incorporated social issues such as child labor, overtime work, and human rights into our supplier social responsibility assessment methods and supervise our suppliers to refrain from employing child labor and forced labor. In 2022, Trina Solar did not have any incidents of child labor, forced labor, or other violations'. It adds: 'We explicitly list the key audit requirements for labor human rights protection and occupational health and safety in the Supplier EHS Management Procedures to ensure unbiased supplier labor rights with clear audit and evaluation management procedures'. It explains its project carried out with suppliers: the Supply Chain Injury Prevention Capacity Building Project. However, no evidence of ongoing efforts to prevent and mitigate forced labour in its operations and supply chain found (for example through capacity building and/or collaboration with others). [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement: The 2022 Sustainability Report notes: 'We evaluate suppliers in various aspects such as technology, quality, delivery, service, cost, innovation, social responsibility, safety, and environment according to their categories and with different weights. Furthermore, we complete an assessment and recognition of suppliers based on the evaluation results, while carrying out targeted communication and counselling, and gradually restricting procurement, freezing and eliminating suppliers that fail to improve in the long run'. However, it is not clear the factors it would consider when deciding whether to end the business relationship if it is not able to adequately use leverage to prevent or mitigate adverse impacts, in the context of forced labour risk management (i.e. relevancy of the supplier, responsible exit). [2022 Sustainability Report, 2023: static.trinasolar.com]
I.3.M	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Employer Pays Principle in policy for own ops and supply chain • Not Met: Describes work with suppliers on paying workers regularly, in full and on time: Company provided feedback to this indicator but information was not material. • Not Met: Description of implementation and monitoring of this practice: The 2022 Sustainability Report notes: 'We strictly abide by the relevant wage management laws and regulations in each place of operation, and also set up a Human Resources Management Committee (HRC), which is committed to continuously optimizing a fair, just and reasonable compensation and benefits management system'. However, no description found of how it implements and monitors this practice in full and on time; providing workers with a payslip], particularly with employment agencies/labour brokers/ recruitment intermediaries. [2022 Sustainability Report, 2023: static.trinasolar.com] • Not Met: Requirements on paying in full and on time in supplier codes and contracts: The Company states that 'It ensures compliance with applicable laws and regulations prohibiting forced labor, protecting minors, regulating working hours and wages' However, no requirement was found to pay workers in full and on time. Company provided feedback to this indicator but information was not material. [Corporate Social Responsibility Code of Conduct of Trina Solar Supplier (Outline): static.trinasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.4.M	Prohibition of forced labour: Restrictions on workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts and own operations • Not Met: Describes working with suppliers on free movement of workers: The Human Rights Principles states: 'Trinasolar will not use or tolerate the use of forced, debt bonded, indentured labor, involuntary prison labor, slavery, or human trafficking in its business or supply chain.' However, no description found of how it proactively works with its supply chain to eliminate retention of workers' documents or other actions to physically restrict movement. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com] • Not Met: Description of implementation and monitoring of this practice: The 2022 Sustainability Report notes: 'We explicitly list the key audit requirements for labor human rights protection and occupational health and safety in the Supplier EHS Management Procedures to ensure unbiased supplier labor rights with clear audit and evaluation management procedures. [...] 'we require all suppliers and partners to sign the Trina Solar Supplier Social Responsibility Commitment during the supplier entry process, in which they clearly understand the full Trina Solar Supplier Code of Conduct, including labor protection, and confirm their agreement to comply with it'. However, no description found of how it implements and checks this practice [of not retain workers' personal documents or restrict workers' freedom of movement or require workers to use company provided accommodation], particularly with employment agencies/labour brokers/recruitment intermediaries, labour brokers/recruitment intermediaries. [2022 Sustainability Report, 2023: static.trinasolar.com]
I.5.M	Freedom of association and collective bargaining	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Global Human Rights Principles state that 'Freedom of Association is the right of workers to freely form and join workers' organizations such as labor union, and worker committee for the promotion and defence of occupational interests. Collective bargaining is the negotiation of wages and other conditions of employment by an organized body of employees. Trinasolar respects employees' rights to freely assemble, join unions, and engage in collective bargaining in accordance with local laws. We are committed to treating our employees with dignity and respect and striving to create an environment of open communication where employees can freely speak with their managers about their ideas, concerns or problems. We encourage our employees to share their ideas, concerns, or suggestions through an environment of cooperation and teamwork.' However, it is unclear if the company respects the rights to FoA and CB also where local laws restrict them. In its' supplier CSR code the company states 'It ensures compliance with applicable laws and regulations prohibiting forced labor, protecting minors, regulating working hours and wages, preventing discrimination, allowing freedom of association, and facilitating collective bargaining.' However, similarly, it is unclear if the expectation includes facilitating FoA and CB where local laws might be restricting them. <p>The 2023 Sustainability Report notes: 'Trinasolar strictly follows the Trade Union Law of the People's Republic of China and respects employees' rights to participate in independent labor unions, rights of collective bargaining and freedom of association. In this regard, we have established labor union committees and employee representative assemblies to protect the legitimate rights and interests of our employees. However, no evidence found it prohibits intimidation, harassment, retaliation and violence against trade union members or equivalent worker bodies and trade union representatives both in its own operations as well as in contractual arrangements with its suppliers or supplier code of conduct. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com] & [Corporate Social Responsibility Code of Conduct of Trina Solar Supplier (Outline): static.trinasolar.com]</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on FoA/CB: The 2022 Sustainability Report explains its Supplier Environmental and Social Performance Assessment: 'Our publicly available Code of Business Conduct emphasizes the requirements and constraints on environmental and social standards of conduct for all suppliers, and provides reporting channels to encourage mutual monitoring. We have established and implemented the Supplier EHS Management Procedure, which specifies that procurement staff should record the relevant supplier performance in the Supplier EHS and Social Responsibility Form, and conduct annual supplier EHS and social responsibility audit scores'. It provides further information on its responsible procurement approach. However, no description found of how it proactively works to support the practices of its suppliers in relation to freedom of association and collective bargaining. [2022 Sustainability Report, 2023: static.trinasolar.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain: The Company makes reference to its commitment to Freedom of Association and Collective Bargaining found in the Global Human Rights Principles [see above]. However, no assessment of the number affected by (scope of) restrictions to freedom of association or collective bargaining in its supply chain found. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com] & [2023 Sustainability Report, 2024: static.trinasolar.com] • Not Met: Global Framework Agreement
I.6.M	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The Company states that it expects suppliers to act in '[...] compliance with applicable laws and regulations prohibiting forced labor, protecting minors, regulating working hours and wages [...]'. However, no expectation of suppliers to pay living wages could be found. The company provided feedback but information was not material. [Corporate Social Responsibility Code of Conduct of Trina Solar Supplier (Outline): static.trinasolar.com] • Not Met: Describes work with suppliers on living wage: The company provided feedback but information was not material. • Not Met: Description of process to determine living wages with unions: The Company states that 'Trinasolar pays employee compensation which meets, as minimum, or exceeds the requirements of applicable law, including those related to minimum wages, overtimes, and legally mandated benefits [...] Collective bargaining is the negotiation of wages and other conditions of employment by an organized body of employees. Trinasolar respects employees' rights to freely assemble, join unions, and engage in collective bargaining in accordance with local laws.' However, legal minimum wages are not always guaranteeing a living wage. No evidence was found of the Company having a process in place to determine living wages. The company provided feedback but information was not material. [Global Human Rights Principles, 10/08/2024: static.trinasolar.com]

J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.M	Environmental impact assessment and remediation	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectation for business partners to conduct EIA: The 2022 Sustainability Report notes: 'we established and carried out various environmental management systems, including the [...] Construction Project EHS Management Procedure'. It adds: 'As early as the site selection stage, we perform the environmental impact assessment and take local water resources into consideration. During the Reporting Period, our newly built Inner Mongolia base, Suqian Silicon Materials, Yancheng New Energy, Huaian Technology and Qinghai Silicon production base obtained the environmental impact assessment reports issued by third-party institutions'. However, this sub indicator looks for an expectation for business partners to conduct EIAs. Furthermore, the Company states that 'Suppliers shall identify environmental impacts'. However, it is unclear if this expectation amounts to a requirement to conduct EIAs. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Corporate Social Responsibility Code of Conduct of Trina Solar Supplier (Outline): static.trinasolar.com] • Not Met: Expectation for business partners to publish EIA • Not Met: Expectation for business partners to explain CIA
J.2.M	Life cycle assessment	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Conducts regular public life cycle assessments: Trina Solar's 2022 Sustainability Report states that "The Life Cycle Assessment is based on the life cycle assessment methods and requirements of ISO 14040/ISO 14044, and is a scientific and rigorous test of the evaluation targets. Based on the LCA, Trina Solar has conducted a comprehensive analysis of more than ten indicators that affect the global ecological environment, including energy consumption, raw material consumption, acid rain, eutrophication, environmental toxins, waste, and other thousands of substances collected from the Vertex modules." Additionally the Company states in its Circular Economy Policy that 'The company continually improves product design by conducting life cycle assessments to evaluate the environmental impact of products. [2022 Sustainability Report, 2023: static.trinasolar.com] & [Circular Economy Policy, 10/08/2024: static.trinasolar.com] • Met: Reports on progress made on action plan: The Company reports its 2020-2023 Waste Management Key Performance, which includes a 'Non-hazardous waste recycling rate'. [2023 Sustainability Report, 2024: static.trinasolar.com]

K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.M	Anti-corruption due diligence and reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to prohibiting bribes to public officials: The Company states that it 'strictly prohibits the political donations of any kind to candidates or governmental officials running for political office. The Company is also prohibited from making any cash or non-cash payments of facilitation or 'acceleration fees', and from making any facilitation or 'acceleration fee' payments through a Business Partner.' The Company also states that 'It is prohibited to offer, promise, give, authorize, direct or indirect, to give money or anything else of value (such as gifts, hospitality, travel, commercial sponsorship, charitable donations, job opportunities, facilitation payments, business contracts, etc.) to any person in the public sector or private enterprise with unduly influencing the recipient's proper duties or conduct, to obtain or maintain other improper benefits in business'. However, it is not clear if the Company is committed to not engage in active or passive acts of bribery and corruption of the relatives and associates of public officials or employees of business relationships beyond the question of employment. [Anti-bribery Compliance Management Policy, 15/11/2024: static.trinasolar.com] • Not Met: Expectation extends to relevant business relationships: The Company states in its CSR Code of Conduct for Suppliers that 'Suppliers shall adopt a zero-tolerance policy prohibiting any and all forms of bribery, corruption, extortion and embezzlement. Suppliers shall comply with the ethical business commitments and Anti-corruption clause contained in the relevant agreement. Bribes and other forms of benefits offered to obtain an illegal or improper advantage must not be promised, offered, authorized, given or accepted. Supplier shall not sign an employment agreement with the Trina solar employees and their immediate family, establish an employment relation with the Trina solar employees and their immediate family, hire the Trina solar employees and their immediate family to work for them or employ the Trina solar employees and their immediate family as employees, advisors, directors or shareholders. Supplier shall not provide money or any kind of benefit to Trina solar employees for providing relevant business advice or services'. However, no clear expectation was found for suppliers to not engage in any active or passive act of bribery and corruption of public officials or employees of business relationships, or their relatives and associates, directly or through business intermediaries. [Corporate Social Responsibility Code of Conduct of Trina Solar Supplier (Outline): static.trinasolar.com] • Not Met: Reports on any complaints on corruption and bribery: The Company reports that 'In 2023, Trinasolar did not have any lawsuits or cases involving corruption or violation of business ethics' However, it is unclear if this means that no complaints were raised at all. [2023 Sustainability Report, 2024: static.trinasolar.com]
K.2.M	Payments to governments & contract transparency	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Publishing a tax CbCR in line with GRI 207-4, or: The Company has Tax Guiding Principles, which outline commitments. The document states that 'The Company adheres to all applicable tax laws and regulations in all jurisdictions in which the Company operates. The Company maintains honest and open communication with tax authorities and tax policymakers. We provide transparent and accessible information to facilitate their understanding of our tax strategy and business model, guiding our daily tax operations. The Company reports and discloses its tax position in accordance with applicable domestic and international tax regulations, maintaining transparency in our operations and tax practices.' However, no evidence was found of the Company publishing a Country-by Country tax report in line with GRI 207-4. [Tax Guiding Principles, 11/12/2024: static.trinasolar.com] • Not Met: Disclosure of terms, contracts, agreements for those payments • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI • Not Met: Expectation for project developers clients to disclose payments to governments at project level (including on land and natural resources)

L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.M	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: The Human Rights Principles states: 'Trinasolar values diversity, equity and inclusion in our workforce, as well as in our customers, suppliers, and other stakeholders. We provide equal employment opportunity for all applicants and employees, adhering to the principle of equal pay for equal work. We do not discriminate on the basis of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>race, nationality, national origin, color, religious belief, gender, age, physical or mental disability, marital status, fertility status, political affiliation, sexual affiliation or any other characteristic protected by local law, regulation or ordinance'. The 2023 Sustainability Report notes: 'Through a series of trainings and awareness-raising programs, we ensure that employees all over the world study and understand Trina Solar's requirements and attitudes toward anti-discrimination, anti-harassment, and diversity'. However, it is not clear it provides mandatory and regular (at least annual) in person, virtual, and/or written training, to its staff on all types of contracts on equality, equity, diversity, anti-discrimination (including gender-based violence), as actual evidence of performance found seems to focus in new employees. [2023 Sustainability Report, 2024: static.trinasolar.com] & [Global Human Rights Principles, 10/08/2024: static.trinasolar.com]</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to provide training • Not Met: Provides materials and access to resources for trainings • Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it
L.2.M	Gender balance and sensitivity	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents: The 2022 Sustainability Report notes: 'Trina Solar attaches great importance to the diversity of the Board of Directors, and continues to build a diverse and professional Board of Directors in multiple dimensions such as gender [...], in order to improve corporate decision-making and enhance the effectiveness of the Board of Directors with a comprehensive and integrated perspective and concept'. Also, 'We are actively committed to building a diverse, equal and inclusive corporate culture. In the Trina Solar Code of Business Conduct and Ethics for Employees, we explicitly and firmly oppose to any form of discrimination, intimidation, harassment and other disciplinary actions, provide equal and diverse career development paths for our employees, commit to eliminating discrimination in terms of gender [...] in the hiring, promotion, training, and termination of employees, ensuring that all employees enjoy open, fair, and just job opportunities. Through a series of trainings and awareness-raising programs, we ensure that employees all over the world study and understand Trina Solar's requirements and attitudes toward anti-discrimination, anti-harassment, and diversity'. The Human Rights Principles states: 'Trina Solar values diversity in our workforce, as well as in our customers, suppliers, and other stakeholders. We provide equal employment opportunity for all applicants and employees. We do not discriminate on the basis of [...] gender, [...] pregnancy, or any other characteristic protected by local law, regulation or ordinance'. However, no evidence found it commits to and adopts a timebound action plan to integrate a gender lens to human rights policies and practices including its human rights due diligence process, risk management and remedy. [2022 Sustainability Report, 2023: static.trinasolar.com] & [old_Global Human Rights Principles, 30/09/2022: static.trinasolar.com] • Not Met: Demonstrates progress through annual reporting • Not Met: Women and non-binary people make up at least 40% of the Company's executives: The Company discloses a percentage of 26.06% female employees. However, no reporting was found on the percentage of executives that are women or non-binary. [2023 Sustainability Report, 2024: static.trinasolar.com] • Not Met: Women and non-binary people make up at least 40% of the Company's board of directors: The Company indicates that 'By the end of the Reporting Period, all the seven directors of Trina solar were male. [...] in January 2024, Trina solar completed the election of the third Board of Directors through a cumulative voting system; among them, Jiang Hongzhen is a female Director. In the future, when selecting and appointing directors, we will consider multi-dimensional considerations in terms of gender, age, educational background, and industry experience in order to diversify the Board of Directors and improve decision-making efficiency and corporate governance. In addition, there is currently one female supervisor on the Supervisory Committee.' Therefore, only 1 in 7 board members are women, no evidence of non-binary board members was found. [2023 Sustainability Report, 2024: static.trinasolar.com]
L.3.M	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Has closed gender wage gap or timebound commitment • Not Met: Reports information at company level across multiple pay bands • Not Met: Expects business relationships to do the same: The Company indicates that it expects suppliers to comply 'with applicable laws and regulations prohibiting forced labor, protecting minors, regulating working hours and wages, preventing discrimination, allowing freedom of association, and facilitating collective bargaining.' however, no clear expectation was found that business relationships are expected to disclose information on gender pay disparity across

Indicator Code	Indicator name	Score (out of 2)	Explanation
			multiple pay bands. [Corporate Social Responsibility Code of Conduct of Trina Solar Supplier (Outline): static.trinasolar.com]

JT. Just transition

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.3.M	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: The Company indicates that 'As an international enterprise, Trinasolar's business footprint extends to many countries and regions, with employees from diverse backgrounds. On this basis, by continuously promoting diversity, we hope to create an inclusive environment with equal opportunities, and attract and retain diverse talents, so as to create long-term and sustainable business and social value.' As a 100% renewable energy company it is considered that all jobs created by the Company is part of the low carbon transition. [2023 Sustainability Report, 2024: static.trinasolar.com] • Not Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders. • Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups: The Company states that 'Trina solar strictly abides by international labor standards, the Labor Law of the People's Republic of China and other laws and regulations. We have formulated and improved internal policies such as the Regulations on Social Recruitment Management. Such policies have specified that any discrimination against race, ethnicity, religion, gender, sexual orientation, etc. is prohibited in the recruitment, promotion, training, and dismissal of employees. The policies also stress gender equality and equal pay for equal work, to ensure that employees enjoy an open, fair and just workplace as well as development and promotion opportunities. It is also required in our Employee Handbook that all employees should respect each other, and any discrimination and harassment should be strictly prohibited. Through a series of training sessions and awareness-raising programs, we ensure that employees all over the world study and understand Trinasolar's requirements and attitudes toward anti-discrimination, antiharassment, and diversity. As of the end of 2023, the proportion of female employees of Trinasolar reached 26.06%, the total number of foreign employees was 3,429, and the total number of ethnic minority employees was 1,875.' [2023 Sustainability Report, 2024: static.trinasolar.com]
JT.4.M	Fundamentals of retaining and re- and/or up-skilling workers for an inclusive and balanced workforce	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.: The Company states 'Trinasolar absorbs talents through diverse channels to build diverse teams. We conduct annual talent inventories, and analyze the gap between existing talents and the talents required for our strategic development, in order to carry out recruitment accordingly'. However, it is unclear if this refers to workers displaced by the low carbon transition. [2023 Sustainability Report, 2024: static.trinasolar.com] • Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition. • Not Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders. • Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.
JT.6.M	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition. • Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition. • Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition. • Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection

Indicator Code	Indicator name	Score (out of 2)	Explanation
	social protection supporting a just transition		

3.a Response to risk of exposure to forced labour (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<ul style="list-style-type: none"> Area: Exposure to high risk of forced labour Story: According to recent data, approximately 35% of the world's polysilicon, and 32% of global metallurgical grade polysilicon, the material from which polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR). Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China" and finds that some instances of forced labour in the Region "may amount to enslavement as a crime against humanity". The Special Rapporteur states he "considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases" in the context of "State-mandated systems". Further analysis by independent UN experts concluded that the violations in the Region "may constitute international crimes, in particular crimes against humanity" and have urged China to address their "repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of religion or belief and under the pretext of national security and preventing extremism". [United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": documents-dds-ny.un.org] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN experts": ohchr.org] [International Service for Human Rights, "Repository of United Nations recommendations on human rights in China": ishr.ch] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar"]
M(0).1	Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> Not Met: Public commitment to full solar supply chain transparency: In its Human Rights Principles, Trina Solar shares that it places a high priority on conflict minerals and implements a traceability system for materials. "In collaboration with [its]suppliers, [it] employ[s] responsible sourcing practices to reject minerals that are mined through human rights abuses, environmental destruction, or violence, thereby promoting sustainable development." <p>In 2023, a Company spokesperson was quoted by Reuters stating "'Trina's data systems and supply chain management allow us to provide detailed traceability documentation, upon request by the U.S. Customs". However, this does not meet the requirement of transparency under this indicator.</p> <p>In its Supply Chain DD Manual, the Company indicates that it provides 'technical tools to support all aspects of supply chain due diligence' that include supply chain transparency and traceability. However, it is unclear if this covers the entire supply chain to the raw material level. Furthermore, no language of commitment to do so was found in this document.</p> <p>The Company provided comments to the BHRRC, indicating its membership in the Global Alliance for Sustainable Energy. This Alliance has produced a position paper in June 2024 which indicates that 'full traceability of a value chain is possible'. However, no commitment made directly by the Company to implement this supply chain traceability was found. [Reuters, 07/03/2023, Exclusive: U.S. solar panel imports from China grow, alleviating gridlock, officials say": reuters.com] [Global Alliance for Sustainable Energy, June 2024, "Position Paper - Implementing Human Rights for a sustainable energy sector": sustainable-energy.eco] [Global Human Rights Principles, 10/08/2024: static.trinasolar.com]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Publication of verified full solar supply chains: The Company provided comments to the BHRRC, stating that following the position of the Global Alliance for Sustainable Energy, it did produce a supply chain mapping. However, this is not publicly available. According to the Company it is available only under NDA to protect its IP. It is unclear if this mapping has been independently verified.
M(0).2	The company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Steps taken aligned with UNGPs: The Company states that "Trina recently announced the expansion of its operations to include a state-of-the-art 6.5 GW wafer facility in Vietnam. The facility recently rolled off its first batch of 210mm ingot, with full-scale operation expected by October this year. The wafers produced are primarily used in cell and module production at Trina Solar's sites in Southeast Asia, including Trina's supply to the U.S. market. The investment for the new facility was made in advance of the DOC's recent shift in policy and demonstrates Trina's commitment to supply chain diversification and compliance. Since 2021, Trina has used only non-Chinese polysilicon for solar modules imported into the U.S. market. Due to these efforts, Trina is the first — and still the only — company to achieve a fully independent supply chain outside of China by using EU and U.S.-sourced polysilicon and manufacturing wafers, cells, and modules in Southeast Asia (SEA)." However, the statement is not sufficient evidence for full, verified disengagement. In addition, no information was found on whether the Company has conducted an assessment of severity of risks, leverage and crucial nature of business relationships. Note: Any disengagement needs to be verified and/or decision-making to continue engagement with "crucial business relationships" in high-risk area needs to be explained, in line with OHCHR Guidance on Business & Human Rights in Challenging Contexts. [Trina Solar complies with UFLPA and ADCVD for all US solar module imports, 2023: trinasolar.com] • Not Met: Information relevant to all destination markets

3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		No allegations meeting the REB severity thresholds under this heading were found

Disclaimer

This scorecard is based on assessments of publicly available documents on companies' websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates* are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of April 2025.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating and remedying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for project developers and oil and gas companies, based on the World Benchmarking Alliance's Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. **Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores** as indicators have been tailored to reflect their position in renewable energy value chains.

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology.

* Cut-off dates: 31 January 2025 for companies that did not engage with the benchmark; the expiration of the feedback period (25 April 2025) for companies that engaged with the benchmark and provided additional documents published during that period.

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